

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF AMERICA,

Appellee

V.

TONY MINH LE, ET AL.

Appellants.

Case No. 22-4560(L)

APPELLANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
FOR FILING OF REPLY BRIEF

Appellants, by counsel, move this Court to grant a 10-day extension for the filing of their Reply Brief. The current deadline for filing is March 17, 2025; we ask that our deadline be extended to March 27, 2025.

On February 4, 2025, this Court issued an amended briefing order following motions to exceed length limits of the briefs; Appellee’s deadline for the filing of their Response to the Appellants’ Opening Brief was March 7, 2025. *See* Doc. No. 115. Appellants filed their Response on March 7, 2025. *See* Doc. No. 122. As a consequence of this extension, the new deadline for the filing of the Appellants’ Reply Brief – March 17, 2025 - falls immediately after counsel for Tony Le and Young Yoo return from travel outside the continental United States for a legal conference and vacation.¹ Mr. Wagner left for the conference on March 3, 2025

¹ Appellants filed a Motion to Extend the Filing Deadline for the Reply Brief on February 25, 2025 (Doc. No. 121); however, that motion was denied as premature. Doc. No. 121.

and will be returning on March 14; Mr. Zerkin left on March 5, 2025 and will be returning on March 16.

Appellants, therefore, move the Court to extend the time for filing the Reply Brief to the government's Response for 10 (ten) days, to March 27, 2025.

The government does not object to this motion.

Respectfully submitted,
TONY MINH LE
By: /s/ Robert J. Wagner
Robert J. Wagner, PLC
Va. Bar No. 27493
101 Shockoe Slip, Suite J
Richmond, VA 23219
(804) 814-8172
(804) 494-5620 (fax)
email: robwagnerlaw@gmail.com

YOUNG YOO
By: /s/ Gerald Thomas Zerkin
Gerald Thomas Zerkin
Attorney-At-Law
Virginia Bar #16270
P.O. Box 5665
Richmond, VA 23220
(804) 921-4885
zerkingt@msn.com

PETER LE
By: /s/ Lana Manitta
Lana Manitta, Esq., VSB#42994
LAW OFFICE OF LANA MANITTA, PLLC
140B Purcellville Gateway Drive, Suite 511
Purcellville, VA 20132
703-705-4428
FAX 703-705-4429
Email: لمانitta@manittalaw.com

JOSEPH DUK-HYUM LAMBORN

By: /s/ Eric Joseph Brignac

ERIC JOSEPH BRIGNAC

CHIEF APPELLATE ATTORNEY

EASTERN DISTRICT OF NORTH CAROLINA

150 Fayetteville Street, Suite 450

Raleigh, NC 27601

(919) 856-4236

CERTIFICATE OF SERVICE

I hereby certify that, on the 9th day of March, 2025, I electronically filed the foregoing Motion with the Clerk of Court for the United States Court of Appeals for the Fourth Circuit by using the CM/ECF system. The participants in the case are registered CM/ECF users and service will be accomplished by the appellate CM/ECF system.

/s/Robert J. Wagner

Robert J. Wagner, PLC

Va. Bar No. 27493

101 Shockoe Slip, Suite J

Richmond, VA 23219

(804) 814-8172

(804) 494-5620 (fax)

email: robwagnerlaw@gmail.com